WASHINGTON STATE UNIVERSITY
Edward R. Murrow College of Communication

December 18, 2009

Office of the Secretary
The Federal Communications Commission
236 Massachusetts Avenue, N.W., Suite 110
Washington, D.C. 20002

Dear Chairman Genachowski and Commissioners Copps, McDowell, Clyburn and Baker:

Thank you for this opportunity to comment on Empowering Parents and Protecting Children in an Evolving Media Landscape, Docket #09-194.

I am the inaugural dean emeritus of the Edward R. Murrow College of Communication at Washington State University, hold a Ph.D. in communication research from Stanford University, and am ranked first in the nation for research on media literacy by ComVista, which tracks research in communication and media. More information on my work may be found at http://communication.wsu.edu/eaustin/index.htm.

I appreciate your careful attention to this issue because the media are tools, not toys. Yet we often let even young children use media wholly unsupervised. My research and that of our research team can provide useful background information on several of the issues on which you have requested comment. A bibliography is appended to this letter for your reference.

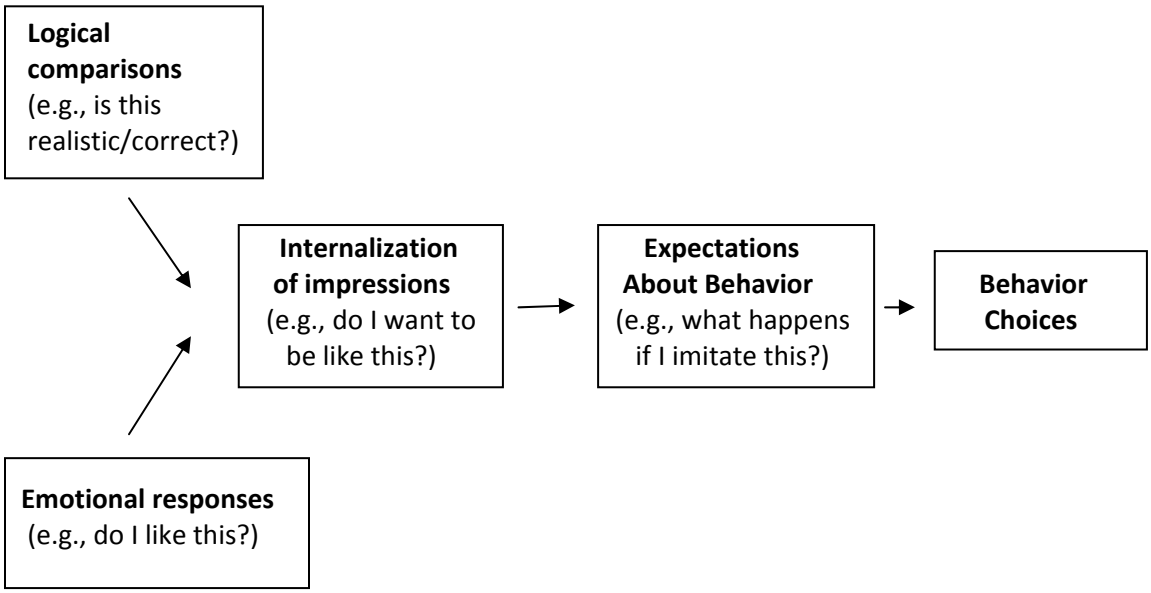
Section C.1.29 re children's lack of understanding of marketing techniques, including those relevant to new media:

A great deal of research has shown that children tend to learn from what they see and tend to imitate behavior they perceive as rewarding. Because media selectively amplify and reinforce tendencies actually present in society, children and adolescents often indicate that a primary reason to use media is to learn about things. How and what children learn from the media, however, changes greatly with age. To thoroughly understand mass mediated messages, children must be able to understand implicit and explicit information, and understand the motivations and intentions of those who develop mediated messages. An adult understanding of these concepts does not develop until approximately the eighth grade.

Even so, around fifth grade **children become better able to understand messages but grow more susceptible to social influence.** In addition, young adolescents will not yet have mastered some decision-making shortcuts available to adults, and some shortcuts rejected by adults as too simplistic may seem adequate to adolescents. Moreover, young people using traditional and new media for enjoyment may have no motivation to process messages in a systematic, skeptical way. This makes children and adolescents quite vulnerable to influence by adults who create messages with full mastery of carefully researched production and messaging techniques.

Our research team, which has been cited by the American Academy of Pediatrics in its policy recommendations regarding children, advertising and media literacy, has helped to delineate these vulnerabilities by showing how children and adults incorporate media messages into decisions through a process that is partly logical and partly emotional. According to the team's summary model of decision making, which is called the Message Interpretation Process Model (MIP), **people internalize or reject media messages through a series of steps that can be strengthened or interrupted, depending on how their skills and motivation for processing of the messages.**

A summary model of the message interpretation process



Research on the MIP model with children, adolescents and young adults have shown that people can reflect on a message in considerable depth through logical analysis, but they also can obsess over a message through wishful thinking (Austin, 2001, 2007). **Emotional reactions to messages can create biases to otherwise logical analyses of those messages.**

The MIP model has been tested on samples ranging from third grade to college age with similar patterns emerging from the data, which suggests that it applies well across developmentally diverse populations. By identifying key interpretation-based filters that individuals use to evaluate messages, the model helps explain why messages succeed or fail in persuading young people and can identify weaknesses in the interpretation process that media literacy interventions can strengthen. Our team's research has shown that **media literacy education can strengthen logic-based decision making, thereby diminishing the impact of wishful thinking.**

Our research also has shown that traditional content analysis may underestimate or in other ways misrepresent the influence of advertising on adolescents. Our research team's studies have shown that **even young adults' understandings of messages differ from the objective observations of trained experts.** This research (Austin & Hust, 2005; Austin, 2008) has established that individuals under the legal drinking age interpret advertisements differently from trained coders across virtually all types of content categories. For example, while trained coders determined that one of every six magazine alcohol ads, and one of every 14 video-based ads, appeared to target teenagers, young adults perceived that even more of the ads targeted them. They also perceived that more underage individuals were portrayed in the ads, more frequently perceived sexual connotations, more often perceived encouragement to drink a lot of alcohol, and perceived fewer moderation messages.

Section C.3.42 and 43 re parental involvement and parental control of children's access:

Parents often do not take full advantage of the tools available to them for guiding the use and effects of media use, and our research has shown that many parents may not realize how they often unintentionally reinforce messages that can have negative effects on their children. Many parents, like their children, would benefit from media literacy education.

Children tend to believe that the media exist to entertain, educate and tell them the truth even though most media exist in order to make a profit, sell products and advocate ideas. In addition, adolescents use media heavily as credible, appealing referents to guide them through the process of developing their identities and independence. Absent parental guidance, media "super peers" can become their most authoritative source of information. Little research exists on new media specifically, but what does exist suggests that the principles tested regarding traditional media also apply well to new media.

Parental involvement and control over children's access and interpretations of media content can be divided into four approaches. These include coviewing, behavioral modeling, general communication norms and rule making (Austin, 2001). **Coviewing without discussion has little or unpredictable influences** because it is a passive activity. Studies have shown that children often interpret coviewing of advertising as endorsement of the messages. In addition, because parents often use rule-making to avoid discussion of content, **rule making can represent avoidance rather than intervention or prevention**, and many children circumvent house rules by using forbidden material at friends' houses. Moreover, because they have not practiced

interpreting such messages carefully under the guidance of parents, they are less prepared to critically evaluate messages they do encounter. Indeed, some researchers have found that more rule-making associates with less comprehension of advertising.

Mediation (Countering and Endorsing Media Content) is a more direct approach to media guidance. Our research has shown that **it is important to consider affirmative comments that reinforce content** as realistic, representative, enjoyable, relevant and morally correct **as distinct from "negative" mediation, comments that question the content** in terms of its realism, truthfulness, accuracy, representativeness, relevance or moral correctness. Research has indicated that mediation without any valence can be misinterpreted or can backfire.

Parents may use positive or negative mediation, or a combination of the two mediation styles (Austin, Fujioka & Engelbertson, 1999). Parents tend to employ negative mediation when concerned about media influence or skeptical of media messages. Parents tend to use positive mediation when they have a low level of skepticism and when they have positive attitudes toward television in general. Positive mediators watch more television and more often watch with the child. Negative mediators tend to watch less television and exhibit more skepticism, with **much negative mediation occurring when the television is off.** In some cases, positive mediation seems to occur out of a concern that condemning or countering messages might threaten family harmony.

Our research, along with that of others, has shown that **negative mediation seems to have protective effects, and positive mediation can be counter-productive.** In a study with high school students, for example, positive mediation predicted higher expectancies for alcohol use, a greater desire to emulate characters in alcohol ads, and a stronger belief in the realism of the advertising (Austin et al., 2000). Negative mediation, on the other hand, predicted lower levels of expectancies for alcohol use. Positive mediation also has been shown to associate with higher levels of advertising desirability and expectancies for alcohol, even among college students for whom parental influence presumably has waned (Austin & Chen, 2003). Some studies have found that negative mediation helps to activate skepticism toward advertising when critical-viewing skills are present but dormant (Austin et al., 2002). It also associates with fewer purchase requests, less materialism, and less parent-child conflict over potential purchases.

Section D re the role of media literacy and potential model programs:

Our research team has been the first to apply a theoretical model of children's understanding to the evaluation of media literacy programs (Austin & Johnson, 1997). **Evaluations of media literacy programs have been relatively rare and usually have been limited to assessing knowledge of media or liking of the lessons, neither of which predicts behavioral outcomes reliably.** It is important to apply a more sophisticated evaluation strategy to media literacy education, because individuals process information through a series of decision-making filters, and a message can get rejected at any step. The more individuals become aware of these filters, the more they can resist the allure of overly simplistic or glamorized media portrayals and advertising appeals.

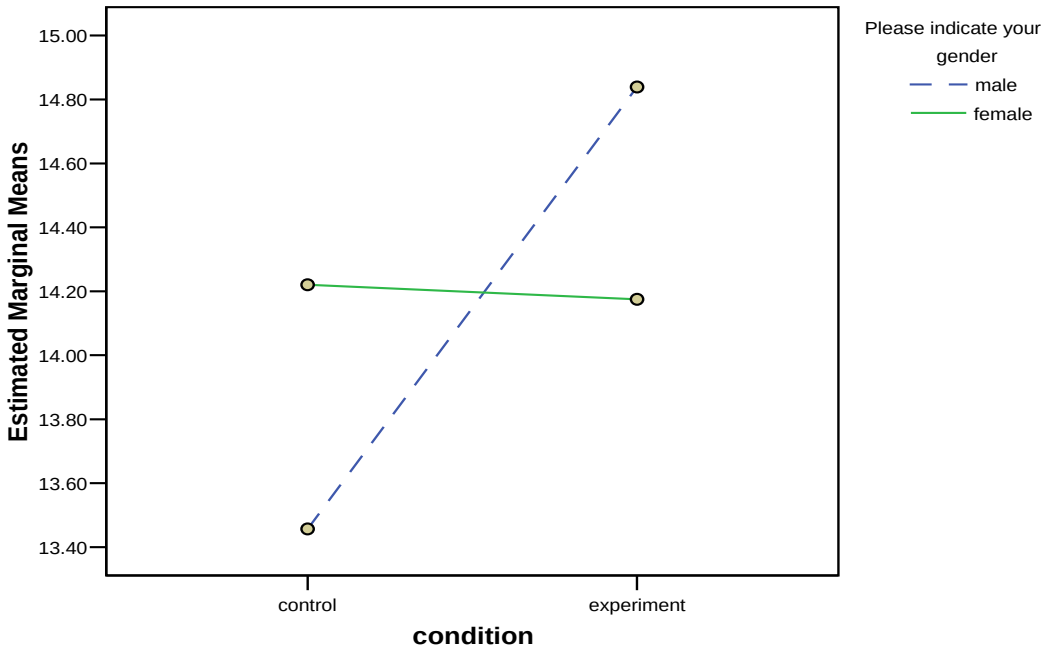
By applying a theoretical model to media literacy evaluation, we have been able to show that media literacy education can help a broad array of children and adolescents.

Overall, our research has suggested that

- Media literacy skills affect behavior
- Media Literacy education is flexible, and useful for varied groups/topics
- Even more change seems possible with younger participants
- Media Literacy education can serve as a catalyst for discussion of a variety of topics

One set of evaluations, of a media literacy program designed to facilitate sex education, showed that the curriculum helped to increase students' understanding of media and sex, and their self efficacy related to sexual decision making (Pinkleton et al., 2008, Pinkleton & Austin, 2009). As shown in Figure 1, **boys were affected by the lessons differently than girls were, but both boys and girls benefitted**. Compared to control-group participants, students were less likely to overestimate sexual activity among teens, more likely to think they could delay sexual activity, less likely to expect social benefits from sexual activity, more aware of myths about sex, and less likely to consider sexual media imagery desirable.

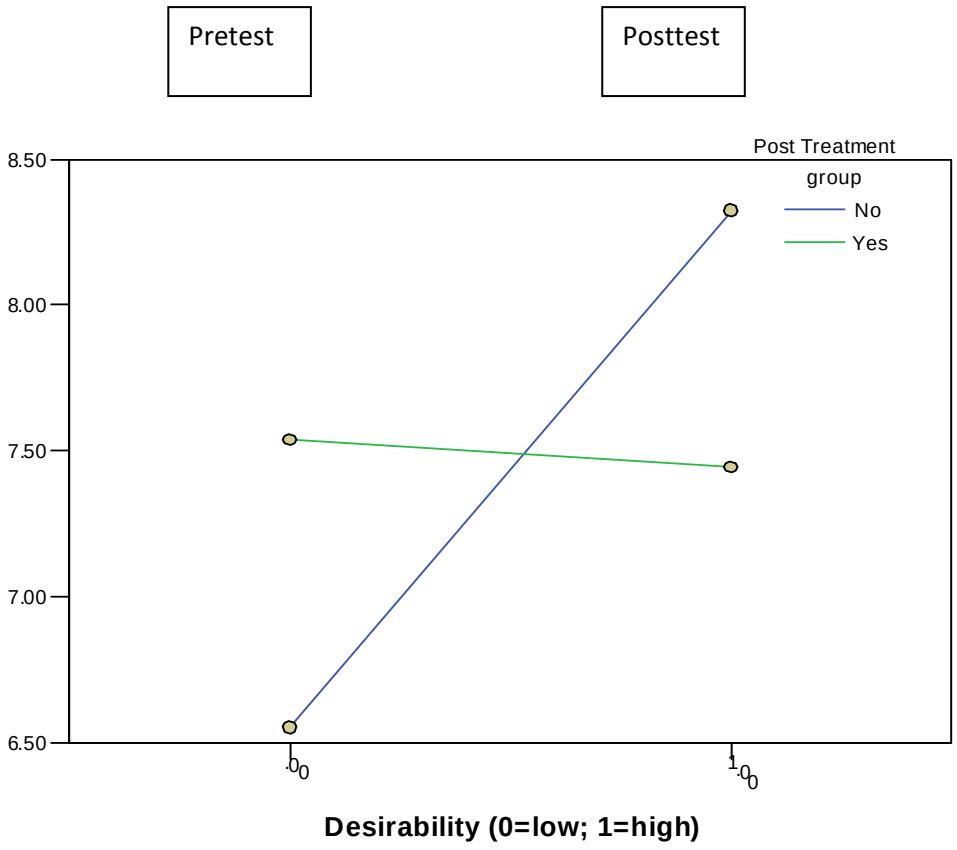
Figure 1: Means for media influence by gender and treatment group



Boys learned something girls already knew about media influence on teens about sex.
Pinkleton et al., *Health Communication, 2008*

An evaluation of a media literacy intervention focused on tobacco use prevention showed that media literacy can have valuable and different effects on those who have and those who have not experimented with tobacco use (Austin et al., 2007; Pinkleton et al., 2007). **Changing one belief could affect another type of belief (see Figure 2).**

Figure 2: Effects of message desirability on perceived peer tobacco use norms

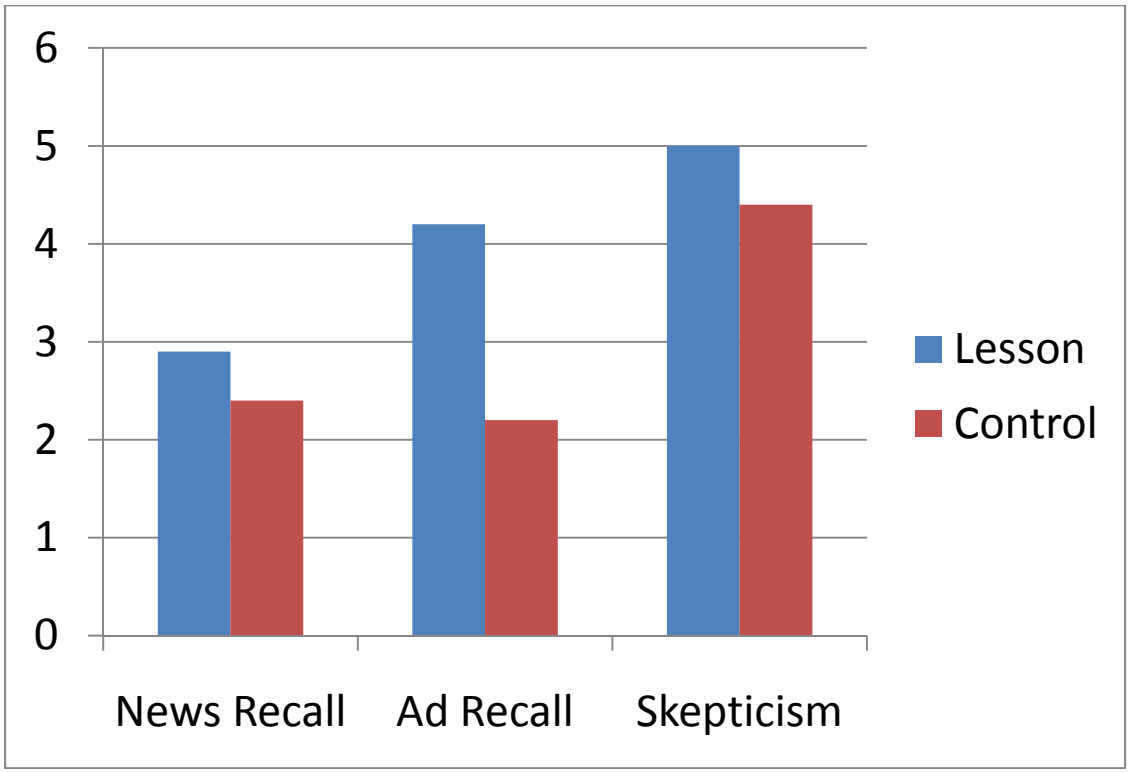


Perceived peer norms no longer affected by how desirable tobacco messages seem
(blue line=control group; green line=media literacy group)
Austin et al., *Communication Research*, 2007; Pinkleton et al., *Health Communication, 2007)*

The results of this experiment also show the importance of measuring cognitively-based changes that may take place gradually as participants gain experience putting lessons learned into action. Results showed that awareness of the content in tobacco advertising increased among participants who had never tried tobacco, along with their motivations to resist it and their determination to help others resist it as well. Participants who had tried tobacco demonstrated somewhat different changes, such as lower levels of identification with media portrayals of smokers, diminished expectancies for tobacco use, and decreased susceptibility to peer influence to use tobacco. They also were less likely than control group members to believe tobacco use is normal and were more likely to discuss tobacco cessation with their friends after participating in the lessons.

Another evaluation showed that **media literacy education can improve the effectiveness of in-school use of media**. In this evaluation, even brief media literacy training magnified potential benefits of the *Channel One* news program (Austin et al., 2006). As shown in Figure 3, these results included recall of program content and increased skepticism toward advertisers. Seventh graders benefited somewhat more than eighth graders.

Figure 3: Results of *Channel One* media literacy experiment



Lesson recipients showed better recall of news stories and ads, and more skepticism of ads.
Austin et al., *Pediatrics, 2006*

Regarding older students, an experiment with 520 college students showed that **a minimal intervention can activate skepticism in individuals who already have fully developed cognitive abilities and** can have both direct and indirect effects on the message interpretation process that can improve the quality of decision making using media messages (Austin et al., 2002).

Based on our evaluations, we think that two sets of media literacy curricula hold considerable promise. The first set has been developed by the Teen Futures Media Network at the University of Washington (Marilyn Cohen, associate professor, primary developer: macohen@u.washington.edu). We have evaluated these programs for tobacco use prevention and for sex education. The second set has been developed by Innovation & Research Training, Inc. based on our theoretical model (Janis Kupersmidt, primary developer: jkupersmidt@irtinc.us). Both sets of curricula have shown promise in initial field experiments. We believe that further testing is necessary, particularly using longitudinal designs.

Needed research:

I suggest several areas of critical need for research:

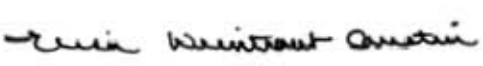
1) An examination of the specific messages younger people perceive in types of advertising and programming, including longitudinal designs, with a focus on
    a. how these interpretations differ from analyses conducted by experts, and
    b. how these interpretations predict their beliefs and behaviors

    This research will provide policymakers with critical information needed to more effectively regulate children's exposure to alcoholic beverage advertising. This information also can help improve the design of educational efforts and public service campaigns geared to children, adolescents and their parents.

2) Future research also should compare different types of media literacy curricula to determine what specific communication strategies are most effective for media literacy education, particularly
    a. for children at different developmental levels
    b. for individuals at different stages of decision making for various topics
    c. for cultural, socio-economic and geographical relevance
    d. for parents
    e. with potential for delayed or decaying effects

I would be happy to visit with you to provide more information on any of the points and findings discussed in this letter. Thank you again for inviting my comments.

Sincerely,



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- 1990-1999 Head of Public Relations Sequence
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Selected Refereed Publications (in reverse chronological order)

- Pinkleton, B.E., & Austin, E.W. (2009). A Pilot Test of Take it Seriously: Sex and Media. *A Supplemental Report commissioned by the Washington State Department of Health, Olympia, WA.* Pullman, WA: Edward R. Murrow College of Communication, Washington State University.
- Austin, E.W. (2008). Using Receiver-Oriented Message Analysis to Measure Media Content:
- Lessons from Alcohol Advertising. In D. Kunkel, A. Jordan, J. Manganello & M. Fishbein (Eds.), *Media Messages and Public Health: A Decisions Approach to Content Analysis.* Routledge.
- Austin, E. W.. (2007). The Message Interpretation Process model. In J.J. Arnett (Ed.), *Encyclopedia of Children, Adolescents, and the Media*. Thousand Oaks, CA: Sage Publications.
- Pinkleton, B. E., Austin, E. W., Cohen, M., Chen, Y., & Fitzgerald, E. (2008). Effects of a peer-led media literacy curriculum on adolescent knowledge and attitudes regarding sexual behavior and media portrayals of sex. *Health Communication, 23*, 462-472.
- Austin, E. W., Pinkleton, B. E., & Funabiki, R. P. (2007). The desirability paradox in the effects of media literacy training. *Communication Research, 34,* 483-506.
- Austin, E. W., Pinkleton, B. E., Hust. S. J. T., & Miller, A. C. (2007). The locus of message meaning: Differences between trained coders and untrained message recipients in the analysis of alcoholic beverage advertising. *Communication Methods & Measures*.
- Austin, E. W., Pinkleton, B. E., & Funabiki, R. (2007). The desirability paradox in the effects of media literacy training. *Communication Research, 34,* 483-506.
- Pinkleton, B. P., Austin, E. W., Cohen, M., & Miller, A. (2007). A state-wide evaluation of the effectiveness of media literacy to prevent tobacco use among adolescents. *Health Communication, 21,* 23-34.
- Austin, E. W., Chen, Y., Pinkleton, B. E, & Quintero Johnson, J. (2006). The benefits and costs of *Channel One* in a middle school setting and the role of media literacy training. *Pediatrics, 117,* e423-e433.
- Austin, E. W., Chen, M., & Grube, J. W. (2006). How does alcohol advertising influence underage drinking? The role of desirability, identification and skepticism. *Journal of Adolescent Health, 38,* 376-384.
- Austin, E. W., & Hust, S. J. T. (2005). Targeting adolescents? The content and frequency of alcohol and nonalcohol beverage ads on magazine and video formats November 1999-April 2000. *Journal of Health Communication. Journal of Health Communication, 10,* 769-785.
- Austin, E. W., Pinkleton, B. P., Cohen, M., & Hust, S. (2005). Evaluation of American Legacy Foundation/Washington State Department of Health media literacy pilot study. *Health Communication. 18*(1), 75-95.
- Fujioka, Y., & Austin, E. W. (2003). The implications of vantage point in parental mediation of television and child's attitudes toward drinking alcohol. *Journal of Broadcasting & Electronic Media.*
- Fujioka, Y., & Austin, E. W., (2002). The relationship of family communication patterns to parental mediation styles. *Communication Research, 29*(6) 642-665.
- Andsager, J. L., Austin, E. W., & Pinkleton, B. E. (2002). Gender as a variable in interpretation of alcohol-related messages, *Communication Research, 29*(3), 246-269.
- Austin, E. W., Miller, A. R. , Silva, S. , Guerra, P. , Geisler, N. , Gamboa, L. , Phakakayai, O. , & Kuechle**,** B. (2002). The effects of increased awareness on college students' interpretations of magazine advertisements for alcohol. *Communication Research, 29*(2), 155-179.

- Pinkleton, B.. E., Austin, E. W., & Fujioka, Y. (2001). The relationship of perceived beer ad and PSA quality on high school students' alcohol-related beliefs and behaviors. *Journal of Broadcasting & Electronic Media, 45*(4), 575-597.
- Austin, E. W., & Pinkleton, B.. E. (2001). The role of parental mediation in the political socialization process. *Journal of Broadcasting & Electronic Media, 45*(2), 221-240.
- Austin, E. W.. (2001). Effects of family communication on children's interpretation of television. In J. Bryant & J. A. Bryant (Eds.), *Television and the AmE.n Family, 2nd Ed.* (pp. 377-396). Mahwah, NJ: Lawrence Erlbaum Associates.
- Andsager, J. L., Austin, E. W., & Pinkleton, B.. E. (2001). Questioning the value of realism: Young adults' processing of messages in alcohol-related public service announcements and advertising. *Journal of Communication, 51*(1), 121-142.
- Austin, E. W., & Knaus, Christopher. (2000). Predicting the potential for risky behavior among those "too young" to drink, as the result of appealing advertising. *Journal of Health Communication, 5*(1)*,* 13-27.
- Austin, E. W., Pinkleton, B.. E., & Fujioka, Y. (2000). The role of interpretation processes and parental discussion in the media's effects on adolescents' use of alcohol. *Pediatrics, 105,* 343-349.
- Fortman, K. K. J. , Clarke, T. L. , & Austin, E. W.. (1998). Let's talk about what we're watching: Parental mediation of children's television viewing. *Communication Research Reports 15*(4), 413-425.
- Austin, E. W., Bolls, P. , Fujioka, Y. , & Engelbertson, J. (1999). How and why parents take on the tube. *Journal of Broadcasting & Electronic Media, 43*(2), 175-192.
- Austin, E. W., Knaus, C. , & Meneguelli, A. (1998). Who talks how to their kids about TV: A clarification of demographic correlates of parental mediation patterns. *Communication Research Reports, 14*, 418-430.
- Austin, E. W., & Johnson, K. K. (1997). Immediate and delayed effects of media literacy training on third graders' decisionmaking for alcohol. *Health Communication,* 9(4), 323-349.
- Austin, E. W. & Freeman, C. (1997). Effects of media, parents and peers on African-AmE.n adolescents' efficacy toward media celebrities. *Howard Journal of Communication, 8,* 275-290.
- Austin, E. W., & Johnson, K. K. (1997). Effects of general and alcohol-specific media literacy training on children's affinity for alcohol. *Journal of Health Communication, 2*, 17-42.
- Austin, E. W. (1995). Reaching young audiences: Developmental considerations in designing health messages. In R. Parrott & E. Maibach (Eds.), *Designing Health Messages: Approaches from Communication Theory and Public Health Practice* (pp. 114-144). Beverly Hills: Sage Publications.
- Austin, E. W. & Nach-Ferguson, B. N. (1995). Sources and influences of young school-age children's general and brand-specific knowledge about alcohol. *Health Communication, 7*(1), 1-20.
- Austin, E. W. & Meili, H. K. (1994). Effects of interpretations of televised alcohol portrayals on children's alcohol beliefs. *Journal of Broadcasting & Electronic Media, 38*, 417-435.
- Austin, E. W.. (1993). Exploring the effects of active parental mediation of television content. *Journal of Broadcasting & Electronic Media, 37*, 147-158.
- Austin, E. W. (1992). Dialogue: Parent-child TV interaction: The importance of perspective, *Journal of Broadcasting & Electronic Media, 36*, 359-361.
- Austin, E. W., Roberts, D. F., & Nass, C. I. (1990). Influences of family communication on children's television interpretation processes." *Communication Research, 17*(4), 545-564.